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NCIC HPV
Sent by: Mary-Beth
Weaver

05/27/2003 12:55 PM

To: NCIC HPV, moran.matthew@epa.gov

CC:

CC:

Subject: Response to Environmental Defense's comments dated 3/4/03
regarding HPV Chemical Substance: Silane, dichlorodimethyl-,
reaction products with silica (CAS 68611-44-9).



Stewart_Miller@cabot-corp.com on 05/27/2003 09:56:53 AM

To: rdenison.environmentaldefense.org@cabot-corp.com, oppt.ncic@epamail.epa.gov,
hvp.chemrtk@epamail.epa.gov, Karen Boswell/DC/USEPA/US@EPA, Rtk Chem/DC/USEPA/US@EPA,
lucierg@msn.com

CC:

Subject: Response to Environmental Defense's comments dated 3/4/03 regarding HPV Chemical Substance:
Silane, dichlorodimethyl-, reaction products with silica (CAS 68611-44-9).

Submitted via Internet 05/27/03 to: rdenison.environmentaldefense.org,
oppt.ncic@epa.gov, hvp.chemrtk@epa.gov, boswell.karen@epa.gov,
chem.rtk@epa.gov, lucierg@msn.com

On March 4, 2003, Environmental Defense submitted, via the internet, its
comments on the robust summaries and test plan for Silane,
dichlorodimethyl-, reaction products with Silica, CAS RN 68611-44-9. The
IUCLID data set and test plan for the above referenced substance were
posted on the ChemRTK HPV Challenge Program Web site on November 4, 2002.
The HPV Consortia, consisting of Cabot Corporation, Degussa AG and
Wacker-Chemie GmbH, appreciates the time and effort ED put forth to review
our documents and provide cogent and insightful comments to our submission.

In response to the ED's various recommendations the consortia offers the
attached Additional Discussion of Toxicity Testing for the HPV substance in
support of our position that no additional testing is needed nor required
to understand the environmental fate, repeat dose and
reproduction/development toxicity of the HPV Chemical Substance. A
revised IUCLID Data Set, addressing the comments/recommendations made by
the EPA was submitted to the EPA on May 01, 2003, and is attached to this
document.

Sincerely,

Stewart H. Miller
Product Regulatory Affairs Manager
Corporate SH&E
Phone: 978-671-4143
Fax: 978-670-6955

(See attached file: ED Response - Additional Discussion of Tox Issues for
HPV Chemical Substance.doc) (See attached file: Response to EPA - Final
IUCLID Data Set with changes - 04.10.03.rtf)



ED Response - Additional Discussion of Tox Issues for HPV Chemical Substance.doc



Response to EPA - Final IUCLID Data Set with changes - 04.10.03.rtf

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